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*Attorneys for Defendant Epic Systems Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DEFENDANT EPIC SYSTEMS  
CORPORATION'S OPPOSITION TO  
PLAINTIFF CUREIS HEALTHCARE,  
INC.'S ADMINISTRATIVE MOTION FOR  
LEAVE TO FILE PARTIALLY UNDER  
SEAL PORTIONS OF PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

Judge: Hon. Maxine M. Chesney

1 Pursuant to Civil Local Rules 7-11(b) and 79-5(c), Defendant Epic Systems Corporation  
2 (“Epic”) files this Opposition to Plaintiff CureIS Healthcare, Inc.’s (“CureIS”) Administrative  
3 Motion for Leave to File Partially Under Seal Portions of Plaintiff’s First Amended Complaint  
4 (Dkt. No. 38 (“CureIS’s Motion”)).

5 CureIS’s Motion is predicated on the same arguments set forth in its Administrative  
6 Motion for Leave to File Under Seal Portions of Plaintiff’s Complaint. (*See* Dkt. No. 2.)  
7 Accordingly, Epic incorporates by reference the arguments made in its Notice of Motion and  
8 Motion to Partially Unseal CureIS’s Complaint. (*See* Dkt. No. 25 (“Motion to Unseal”).)  
9 Specifically, the customer-identifying information<sup>1</sup> described in CureIS’s Motion should not be  
10 redacted as CureIS has failed to establish compelling reasons supporting redaction, including  
11 because (i) CureIS itself affirmatively publicly disclosed the existence of customer relationships  
12 for many years on its own website and elsewhere to market its products and services (*id.* at 7-8),  
13 and (ii) CureIS has not advanced particularized reasons supported by facts sufficient to meet its  
14 burden to justify sealing (*id.* at 8-12). In addition, there is a strong public interest in this matter  
15 that would be best served by disclosing the names of the customers at the center of CureIS’s  
16 allegations so that the public can assess the veracity of each party’s allegations and arguments  
17 (*id.* at 12-13).

18 Except as to the names of non-party employees, CureIS’s Motion should be denied, and  
19 the customer-identifying information presently redacted in CureIS’s First Amended Complaint  
20 (Dkt. No. 40) should be unsealed.

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27 <sup>1</sup> As explained in Epic’s Motion to Unseal, Epic does not contest sealing of the names of  
28 non-party employees. (Motion to Unseal at 4 n.3.)

1 Dated: July 18, 2025

Respectfully submitted,

2 By: /s/ Lauren A. Moskowitz

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